



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LRO  
F. #2022R00580

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 17, 2024

By E-mail and ECF

The Honorable Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Shlomo Patchiav  
Criminal Docket No. 23-99 (DLI)

Dear Judge Irizarry:

The parties jointly and respectfully submit this letter, pursuant to the Court's November 20, 2023 order, to provide a status report in the above-captioned case. As set forth below, the parties remain available to appear as scheduled for the January 24, 2024 status conference, and are prepared to request a briefing schedule for pretrial motions.

As the Court is aware, on March 6, 2023, a grand jury sitting in the Eastern District of New York returned an indictment charging the defendant with extortion conspiracy, in violation of Title 18, United States Code, Section 1951(a). Since then, the government has made multiple productions of discovery to the defendant, including on July 17, 2023, August 29, 2023 and September 26, 2023. The government has also conferred with defense counsel to answer questions and to facilitate defense counsel's access to the discovery materials. Most recently, on November 20, 2023, the parties submitted a status report indicating that the defendant required additional time to review discovery. See ECF No. 35.

At this time, the parties jointly and respectfully request that the Court set a schedule for pretrial motions at the upcoming January 24, 2024 status conference, set a new date for a status conference, and exclude time until that date. The parties submit that an exclusion of time under the Speedy Trial Act is in the interests of justice, as it will afford the parties an opportunity to file

pretrial motions and to continue to engage in plea negotiations in the hope of resolving this matter short of trial. See 18 U.S.C. §§ 3161(h)(1)(D), (h)(7).

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
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cc: Counsel for the Defendant (by ECF)  
Clerk of Court (DLI) (by ECF)